

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MADHU JAIN,)
PLAINTIFF)
v.)
A CAPE ANN WHALE)
WATCH, INC.)
DEFENDANT)

C.A. No. 05 11267 MEL

PLAINTIFF'S MOTION IN LIMINE TO CONDUCT PART OF DEFENDANT'S
CROSS-EXAMINATION OF PLAINTIFF AT SIDEBAR

Now comes the plaintiff and respectfully moves in limine to conduct part of defendant's cross-examination of plaintiff at sidebar because of embarrassment.

Defendant is expected to cross-examine plaintiff about loss of bladder control. In her deposition plaintiff stated that she did not have trouble controlling her urine while paramedics at the scene were attending her. Apparently the paramedics noted otherwise.

Leaving aside the value of this discrepancy, plaintiff asks that the examination take place at sidebar because of unnecessary embarrassment.

WHEREFORE, the plaintiff respectfully moves in limine to move this testimony to sidebar.

By the Plaintiff,


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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party and any party appearing pro se by (first class mail, postage prepaid) or (by hand delivery) *fax*
Dated 6/1/07 